

**THE UNITED STATE DISTRICT COURT  
EASTERN DISTRICT OF PENNSYLVANIA**

NOAH BANK, and	)	
EDWARD SHIN	)	
a/k/a EUNGSOO SHIN	)	Civil Action No. 18-01413-WB
	)	
Plaintiffs	)	
vs.	)	
	)	
SUNDAY JOURNAL USA CORPORATION	)	
	)	
Defendant	)	

**DEFENDANTS' INITIAL DISCLOSURES PURSUANT TO F.R.C.P., RULE 26(a)**

The Defendants, Sunday Journal USA Corporation and Y & L Media, Inc., d/b/a Sunday Journal USA, via counsel and without waiving their claim that this Honorable Court does not have proper jurisdiction over said Defendants, submit these initial disclosures pursuant to F.R.C.P., Rule 26(a).

1] Defendants believe the following persons are likely to have discoverable information relevant to the claims in this action:

[a] All parties hereto, the addresses of whom are disclosed in the pleadings or are otherwise known to the Plaintiffs.

[b] Chi Y An, the author of the allegedly offending article, who may be contacted via Defendants' counsel.

[c] Employees of the Noah Bank with knowledge of the facts and circumstances relating to the Plaintiffs' claims and allegations, including but not limited to claims for damages.

[i] Employees of the Noah Bank with knowledge of the facts and circumstances relating to the litigation against the bank, including but not

limited to the action which resulted in a Consent Order and the pending  
qui tam action against the bank.

[d] Witnesses to events described in the allegedly offending article, including but not  
limited to, the altercation resulting in Mr. Shin' physical injuries.

2] Defendants' have in their possession, custody or control, documents supporting the facts  
set forth in the allegedly offending article, including but not limited to:

[a] Court records including a Consent Order, litigation filed by Mr. Shin seeking  
damages for his injuries, and records from the Registry of Deeds.

[b] A video still and/or clip of an altercation in which Mr. Shin was involved,  
referenced in the allegedly offending article and the First Amended Complaint.

3] Defendants' contend, *inter alia*, the Plaintiffs' are quasi-public figures, the articles are  
true and/or substantially true, published without malice, such that they are not actionable.

4] Defendants' do not possess any insurance coverage relevant to this action.

DATE: September 13, 2018

Respectfully submitted by,

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